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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03070-JD

**DECLARATION OF JEFFREY
SHAPIRO**

Declaration of Jeffrey Shapiro
Case No. 3:25-cv-03070-JD

DECLARATION OF JEFFREY SHAPIRO

I, **Jeffrey Shapiro** declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. Nationwide, NFFE represents approximately 110,000 federal workers, approximately 11,000 of whom are dues-paying members, from agencies across the federal government.

3. NFFE VA Council and the Locals that are members of the Council represent approximately 9698 employees working at the Department of Veterans Affairs (VA) and Department of Veterans Benefits (VBA). NFFE members include Vocational rehabilitation counselors, nurses, psychologists, doctors, and physical therapists who provide care for our nation's veterans in the Department of Veterans Affairs in many locations throughout the nation.

4. NFFE's VA Council and member locals have demanded to bargain over Trump administration policies including the return to in-office work and telework, without success.

5. NFFE's VA Officers and stewards represent employees primarily on official time which the Executive Order abolishes in the Department of Veteran's Affairs. Our members perform much of their representation using VA equipment such as computers, computer systems and phones, also abolished by the Executive Order. The loss of official time and use of agency equipment will significantly impact our ability to represent our members.

6. NFFE's Local 1 is part of the VA Council. Local 1 represents professional employees of the San Francisco VA Medical Center and System in San Francisco, Oakland, Palo Alto, Santa Clara and throughout the greater Bay Area. Local 1 member's are nurses, psychologists, physical therapists, social workers and related medical

1 professionals who provide medical care to veterans throughout the Bay Area. Local 1 has
2 approximately 554 members and represents approximately 1251 bargaining unit
3 employees.

4 7. NFFE represents our federal sector members through negotiating
5 collective bargaining agreements and assisting employees with enforcing them. We
6 assert contractual and statutory rights on behalf of our federal sector members by filing
7 grievances, unfair labor practice charges, or other complaints through our negotiated
8 grievance procedure or with various federal agencies, including the Federal Labor
9 Relations Authority, the Merit Systems Protection Board, the Office of Special Counsel,
10 and the Federal Labor Relations Authority. NFFE files litigation on employees' behalf in
11 the courts. We also advocate on Capitol Hill and in the media on issues of importance to
12 federal workers and to veterans.

13 8. NFFE's operations are funded solely by members who pay dues to be
14 members of the union, almost exclusively through Agency dues withholding. NFFE will
15 be financially harmed if the Executive Order is implemented because it will immediately
16 lose dues revenue from members who are covered by the Executive Order. In that event,
17 NFFE would immediately lose hundreds of thousands of dollars of revenue. NFFE
18 currently does not have a mechanism to maintain membership of union members
19 replacing Agency dues withholding.

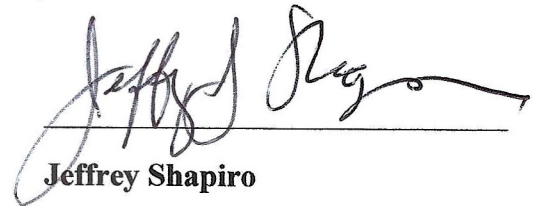
20 9. NFFE's ability to carry out its mission will be severely curtailed if union
21 members in the VA no longer have collective bargaining rights and cannot pay dues to
22 NFFE through Agency dues withholding. For example, NFFE would not have the ability
23 to maintain current staff levels who help with training union leaders, assisting with
24 grievances, negotiating collective bargaining agreements, advocating for employees on
25 Capitol hill, and filing litigation on behalf of the employee's we represent.

26 10. NFFE members pay dues voluntarily as federal employees.
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1 11. We have heard from members who are concerned about NFFE losing
2 strength and bargaining power because of the threat of diminished membership and
3 smaller bargaining units. NFFE leverages its size and the fact we represent over 110,000
4 federal employees when advocating in the media or to Congress and when bargaining
5 with agencies. The Executive Order stands to reduce NFFE's size and capacity, thereby
6 curbing our abilities to advocate for positive change for federal workers.

7 I declare under penalty of perjury under the laws of the United States that the foregoing is
8 true and correct. Executed April 3, 2025, in Ft. Lauderdale, Florida.

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Jeffrey Shapiro